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6 Attorneys for **Linda Livolsi**

7  
8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA

10 UNITED STATES OF AMERICA,  
11 Plaintiff,  
12 vs.  
13 LINDA LIVOLSI and  
14 WILLIAM LIVOLSI, JR.,  
15 Defendants.

2:10-cr-578-APG-GWF

**STIPULATION TO CONTINUE**  
**SENTENCING HEARING**

(First Request)

16 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United  
17 States Attorney, and J. Gregory Damm, Assistant United States Attorney, counsel for the United  
18 States of America, and Rene L. Valladares, Federal Public Defender, and Monique Kirtley, Assistant  
19 Federal Public Defender, counsel for LINDA LIVOLSI, and C. Stanley Hunterton, counsel for  
20 William Livolsi, Jr., that the sentencing hearing currently set for Wednesday, February 18, 2015 at  
21 10:00 am & 10:30 a.m., respectively, be vacated and reset to a date and time convenient to the court,  
22 no sooner than sixty (60) days.

23 This Stipulation is entered into for the following reasons:

- 24 1. That defendants are not in custody, live out of state and are in agreement with the  
25 continuance.  
26 2. The parties are in the process of gathering additional records and mitigation  
27 information essential to the accurate preparation of the pre-sentence investigation report.  
28

1           3.       Counsel for Linda Livolsi is also awaiting additional medical records.

2           4.       The parties agree to the continuance.

3           5.       The additional time requested herein is not sought for purposes of delay, but merely  
4 to allow for a resetting to accommodate the necessary preparations for sentencing and disposition.

5           6.       This is the first request to continue the sentencing hearing filed herein.


6           DATED January 14, 2015

7           RENE L. VALLADARES  
8           Federal Public Defender

DANIEL G. BOGDEN  
United States Attorney

9 By: /s/ Monique Kirtley  
10       MONIQUE KIRTLEY  
11       Assistant Federal Public Defender  
12       Counsel for Linda Livolsi

By: /s/ Gregory Damm  
J. GREGORY DAMM  
Assistant United States Attorney  
Counsel for Plaintiff

13 By:   
14       C. STANLEY JUNTERTON  
15       Counsel for William Livolsi, Jr.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

2:10-cr-578-APG-GWF

Plaintiff,

**ORDER**

vs.

LINDA LIVOLSI,

Defendant.

**FINDINGS OF FACTS**

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

**ORDER**

IT IS THEREFORE ORDERED that the sentencing hearing currently set for Wednesday, February 18, 2015 at 10:00 am & 10:30 a.m., respectively, be vacated and continued to \_\_\_\_\_, at the hours of \_\_\_\_\_ for defendant Linda Livolsi and \_\_\_\_\_ for defendant William Livolsi Jr.

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2015.

\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE